



## U.S. Department of Energy

Grand Junction Office  
2597 B<sup>3</sup>/<sub>4</sub> Road  
Grand Junction, CO 81503

AUG 21 2002

Mr. Joe Ortwerth, County Executive  
St. Charles County  
100 North 3<sup>rd</sup> Street, Suite 318  
St. Charles, MO 63301

Subject: Response to Comments on Draft Long-Term Stewardship Documents for the Weldon Spring Site and Transmittal of August 9, 2002, Draft Long-Term Stewardship Plan

Dear Mr. Ortwerth:

Your agency submitted comments on the subject documents to the U.S. Department of Energy (DOE) in a letter to Ms. Pamela Thompson on October 17, 2001. As you are aware, over the past year DOE's long-term stewardship (LTS) initiatives have continued to evolve on a program-wide and site-specific level. This includes developing and implementing mechanisms to effect a smooth transition of the Weldon Spring site into stewardship status for perpetual federal custody and care.

The DOE and St. Charles County have been working together to complete remediation of the Weldon Spring site. The DOE is committed to maintaining an open and productive relationship between our agencies as the site transitions to long-term stewardship. Successful transition and ongoing stewardship operations at the Weldon Spring site depend on our collaborative effort to ensure public and environmental protection and to build public confidence and trust.

The DOE has released this revised LTS plan for concurrent review by your organization, other stakeholders, regulators, and the public. The revised LTS plan has changed significantly from previous versions. First, the three previous stewardship documents have been consolidated into a single plan. Second, significant progress of implementing site remedies since the previous versions of the documents were presented has allowed DOE to be more definitive in this version of the document. The DOE included general site information and specific instructions to preserve essential site knowledge for future stewards. The revised plan assumes that the user does not possess institutional knowledge of the site, provides a basic understanding of site conditions, and references source documents. The plan also establishes roles and responsibilities for DOE and regulators.

Also enclosed are DOE responses to comments received from your agency in October 17, 2001, on the previous stewardship documents. The DOE has annotated the responses with citations for the August 9, 2002, LTS plan so previous reviewers can easily identify language that DOE revised in consideration of specific comments.

Mr. Joe Ortwerth

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The DOE, as a team from the Weldon Spring site and the Grand Junction Office, trusts this document will help move DOE, its regulators, and stakeholders toward a final LTS plan that will ensure protection of human health and the environment well into the future. The DOE is proceeding with actions that will result in having an effective LTS plan in place for the Weldon Spring site as soon as possible. However, DOE acknowledges that the plan will be revised when the Ground Water Operable Unit is completed.

Your continued support and comments are appreciated. Please call me at 970/248-6091 or Pam Thompson at the Weldon Spring site at 636/926-7004 with questions or concerns about these responses or the overall preparations being made to initiate stewardship oversight of the Weldon Spring site. I hope to see you at the upcoming workshop on August 28, 2002, at the Weldon Spring Interpretive Center.

Sincerely,



Ray Phieness  
Deputy Manager



Pam Thompson  
Project Manager, WSSRAP

Enclosure

cc w/o enclosure:

R. Hampel, WSCC

S. Mahfood, MDNR

D. Wall, USEPA

C. Clayton, DOE-HQ/EM-51

C. Geiser, DOE-HQ/EM-51

J. Aljayoushi, DOE-ID

P. Thompson, DOE-Weldon Spring

D. Bergman-Tabbert, DOE-GJO

A. Kleinrath, DOE-GJO

C. Jacobson, Stoller

File: LWEL 1.1 (Garcia)

**Response to St. Charles County Comments**  
**Dated October 17, 2001**

Continuing Funding Mechanism: DOE will request annual appropriations (a part of the federal budget process). This request will include funding proposed for state and local involvement as considered necessary to ensure adequate long-term involvement in maintaining the selected remedies to protect human health and the environment.

For the first 2 years, the St. Charles County funding has been estimated to be approximately \$50,000 per year.

Reference: Section 3.11.

DOE acknowledges the almost universal concern of state and local governments for assurance of future funding sufficient to maintain long-term stewardship sites in the condition required by the approved remedies. Because this is a policy issue, DOE cannot address the County's concern at the field office level. Establishment of a long-term stewardship funding mechanism other than annual appropriations would require Congressional action.

Protection of Public Drinking Water Supply System: As stated above, GJO will continue to annually request budget for well field protection measures identified in the LTS plan. DOE is compelled to perform the monitoring and evaluation activities described in the plan once the plan is approved.

DOE has not established a contingency reserve, but, with the inclusion of Weldon in the greater LTS budget, DOE has greater flexibility to fund emergencies at a site from within annual appropriations.

Reference: Sections 3.6.1.3, 3.9.2.1, and 3.11.

Institutional Property Controls: Agree. The document now includes a map showing areas requiring ICs and a narrative describing the need for and the specific instrument for ICs will be added in Appendix B upon completion.

Reference: Section 2.3, 2.6, and 3.7.

Interpretive Center Partnership: DOE is committed to maintain and operate the interpretive center as a functional element of public involvement and an educational center documenting and preserving knowledge of past activities at the site.

DOE continues to look forward to establishing a more permanent link between the County and DOE in maintaining this resource into the future.

Consolidated Long-Term Stewardship (LTS) Document: DOE has created an LTS plan that captures stewardship requirements in a single document.

Reference: Sections 3.6.1.3, 3.9.2.1, and 3.11.

With regard to generating a stewardship ROD, please note that EPA has advised that this would not be an appropriate mechanism for specifying stewardship requirements for a CERCLA site (Weldon Spring Groundwater Operable Unit letter from Dennis Grams, EPA, to Steve Mahfood, MDNR, and R. Nelson, DOE, May 12, 2000). However, the LTS plan for the Weldon Spring site is structured to require EPA concurrence, in consultation with the state, for initial implementation and subsequent revision.

Reference: Sections 3.1.